

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAR 15 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACOB CLAYTON BREWER and
SHANNON RENNEE BRADLEY,

Defendants.

4:18CR00215 CDP/NAB

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning sometime in 2017, but including October 21, 2017, and continuing to on or about November, 2017, with the exact dates unknown, in the Eastern District of Missouri and elsewhere,

**JACOB CLAYTON BREWER and
SHANNON RENNEE BRADLEY,**

the defendants herein, did knowingly and unlawfully combine, conspire, agree, and confederate together with each other and other persons, both known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a mixture or substance containing detectable amounts of heroin and fentanyl, Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1)

All in violation of Title 21, United States Code, Section 846, and

That the death of A.C., a person whose identity is known to the Grand Jury, resulted from the use of such heroin and fentanyl distributed by defendants, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT II

The Grand Jury further charges that:

On or about October 21, 2017, in the County of Franklin, Missouri, in the Eastern District of Missouri and elsewhere,

**JACOB CLAYTON BREWER and
SHANNON RENEE BRADLEY,**

the defendants herein, did knowingly and intentionally distribute a mixture or substance containing detectable amounts of heroin and fentanyl, Schedule I controlled substances,

In violation of Title 21, United States Code, Section 841(a) and Title 18, United States Code, Section 2; and

That the death of A.C., a person whose identify is known to the Grand Jury, resulted from the use of such heroin and fentanyl distributed by the defendants, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(C).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts I and II of this Indictment, the defendants shall forfeit to the United States of America:

a. any property, constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation

b. any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such offenses; and

c. a sum of money equal to the total property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations.

2. Subject to forfeiture is United States currency in that such sum equals the total value of property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the offenses alleged in Counts I and II.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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